

## **Finding of No Significant Impact**

In accordance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) prepared a draft environmental assessment (EA) which analyzed the potential environmental impacts of a Gypsy Moth Management Plan for Cuyahoga Valley National Park (CVNP). One of the alternatives evaluated in the EA was identified as the NPS' preferred alternative. The EA was made available to the public on November 17, 2000 and was on public review for 30 days.

The purpose of this decision document is to affirm which course of action the NPS intends to follow and record a finding of no significant impact (FONSI) pursuant to the Council on Environmental Quality's regulations for implementing the National Environmental Policy Act of 1969 (40 CFR 1508.9).

### **The Proposal**

The gypsy moth (*Lymantria dispar*) has become established in CVNP. Gypsy moth populations are expected to fluctuate and occasionally present a risk of defoliation, negatively affecting the natural, cultural, recreational and scenic values of the park. Under the NPS' preferred alternative (Alternative 2), the suppression of gypsy moth populations would be focused primarily on a set of Gypsy Moth Management Areas which include forested areas that have been previously defoliated, areas of significant recreational value, and buffer zones adjacent to non-federal treatment areas. Other areas would not be selected for treatments. The decision regarding which if any of these areas would be treated each year would be based on a set of criteria including defoliation risk, tree mortality risk, the history of previous treatments, and the presence of sensitive areas. The total area treated will fluctuate annually responding to changes in gypsy moth population levels and defoliation effects as documented by an annual monitoring program. The park would continue coordination efforts with other agencies and notify the public of any treatment plans each year. Suppression activities would involve the aerial application of one of two pesticides, *Bacillus thurengiensis* variety *kurstaki* (B.t.k.) and/or Gypchek®.

### **Other Alternatives Considered**

The NPS considered another action alternative (Alternative 3) to suppress gypsy moth populations in all forests on federal land within the park that are at risk for gypsy moth defoliation. This alternative differs from Alternative 2 in that current defoliation risk alone would determine whether an area is treated. Generally, this alternative would often result in a larger prescribed treatment area than Alternative 2 and is more likely to involve repeated treatments of an area in consecutive years. A maximum of approximately 11,500 acres of forested federal land would be designated for treatment each year.

The EA also analyzed a no action alternative (Alternative 1) where the NPS would take no action to suppress or control the gypsy moth on federal land within the park. The

gypsy moth populations and any associated impacts would continue to fluctuate in response to food availability, weather, natural control agents, and suppression activities performed by other agencies and private landowners on adjacent lands.

Other alternatives, including the use of diflubenzuron (Dimilin®), other gypsy moth management techniques, and different treatment area definitions were considered but eliminated from further analysis for reasons detailed in Section 3.2 of the EA.

## **Public Involvement**

On November 17, 2000 the EA was released for public review. A park representative presented information regarding the availability of the draft EA to the Gypsy Moth Task Force of a local communities council earlier that week (November 11, 2000). Availability of the draft was announced in local media. Notices were placed in the 2 major area newspapers and approximately 200 press releases were mailed a week prior to the comment period resulting in several additional newspaper notices. The document was made available at park headquarters, on the park's WWW site ([www.nps.gov/cuva](http://www.nps.gov/cuva)), and by request. The review period for the EA lasted for 30 days.

One written comment was received which supported suppression of the gypsy moth populations. No preference for either Alternative was indicated. No substantial new information requiring modification of the EA was contained in this letter, which may be found in Appendix 7 of the EA.

## **Summary of Environmental Consequences**

The potential environmental consequences of the three alternatives, including the preferred alternative, are described on pages 12-26 of the EA. Briefly, the EA states that the preferred alternative would have no significant impacts on wildlife, vegetation, threatened or endangered species, water quality, wetlands, cultural resources, visitor use, recreational value, scenic values, health and safety in the park, private lands, and local communities.

While some positive and negative effects can be associated with any of the alternatives, the no action alternative (Alternative 1) has the greatest potential for both short-term and long-term negative impacts to the human environment. If suppression actions are not ever implemented, occasional defoliation to the forested areas of the park is expected, possibly resulting in significant tree mortality especially in areas repeatedly defoliated. Impacts to scenic, recreational and ecological values, and public health and safety are expected. Furthermore, adjacent non-federal lands would not be protected from dispersing gypsy moths, even if those areas were treated. Suppression activities as outlined in the action alternatives (Alternative 2 and 3) would help minimize these impacts in treated areas. Some forests left untreated under the preferred alternative (Alternative 2) may experience gypsy moth impacts. However, Alternative 3, which would usually require spraying larger areas of forest than Alternative 2, may itself have additional undesirable negative

effects on non-target species such as native Lepidoptera and on the natural controls of the gypsy moth (the fungus *Entomophaga maimaiga* and the nucleopolyhedrosis virus).

The preferred alternative minimizes the short and long-term effects of gypsy moth on the most critical scenic, recreation and ecological values of the park while supporting suppression activities on adjacent non-federal land. Critical areas would be designated for treatment while other areas remain untreated. Some negative effects on some native Lepidoptera (butterflies and moths) species are expected in areas treated with *B.t.k.* Such reductions in native Lepidoptera may indirectly effect other species that feed on or are pollinated by them. However, these effects are considered temporary and partially mitigated by leaving many adjacent areas untreated, treating some areas with Gypchek® (which affects only gypsy moths), and in minimizing repeated applications when possible. Leaving some areas untreated also helps to preserve the natural controls that are already in the environment. No significant cumulative effects were identified that would result from implementing the preferred alternative. Native Lepidoptera populations in areas treated with *B.t.k.* are expected to recover to pre-treatment levels in 1-2 years. No highly uncertain or controversial impacts, unique or unknown risks, or elements of precedence were identified. Implementation of the preferred alternative will not violate any federal law, and is believed to be consistent with state and local laws.

## **Finding**

The NPS adopts the preferred alternative (Alternative 2) as described in the EA. The NPS selected this alternative because it allows for the protection of the most critical areas of the park from the effects of the gypsy moth while maintaining natural controls and minimizing and mitigating any possible environment impacts of the suppression activity.

The one written public comment on the EA was supportive of suppression actions. Park responses to two comments by the U.S. Fish and Wildlife Service appear in Appendix 5 of the EA. No substantive comments requiring changes to the EA were offered in the public or agency comments. Minor editorial and content changes to the draft EA not affecting the alternatives or analysis of environmental consequences were made to complete the final EA.

On the basis of the information contained in the environmental assessment, it is the determination of the NPS that the preferred alternative does not constitute a major federal action that will significantly impact the quality of the human environment. Therefore, in accordance with the National Environmental Policy Act and regulations of the Council on Environmental Quality (40 CFR 1508.9), an environmental impact statement will not be prepared for this plan.

**Recommended by:**

  
\_\_\_\_\_  
Superintendent, Cuyahoga Valley NP

1-25-01  
Date

**Approved by:**

  
\_\_\_\_\_  
Regional Director, Midwest Region

1/17/01  
Date